



Decision _____

FILED**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

10/20/22

04:59 PM

A2210023

Application of the Mussey Grade Road Alliance for award of intervenor compensation for substantial contributions to Resolutions SPD-1 and SPD-2

A.22-10-XXX
October 20, 2022

**INTERVENOR COMPENSATION CLAIM OF MUSSEY GRADE ROAD ALLIANCE
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF MUSSEY GRADE
ROAD ALLIANCE**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at lcompcoordinator@cpuc.ca.gov.

Intervenor: Mussey Grade Road Alliance	For contribution to Resolutions SPD-1 and SPD-2
Claimed: \$ 55,647	Awarded: \$
Assigned Commissioner: TBD	Assigned ALJ: TBD
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	/s/ Diane J. Conklin
Date: 10/20/2022	Printed Name: Diane J. Conklin

PART I: PROCEDURAL ISSUES
(to be completed by Intervenor except where indicated)

A. Brief description of Decision:	<p>RESOLUTION SPD-1. Resolution Ratifying Action of the Office of Energy Infrastructure Safety on San Diego Gas & Electric Company's 2022 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.</p> <p>RESOLUTION SPD-2. Resolution Ratifying Action of the Office of Energy Infrastructure Safety on Southern California Edison Company's 2022 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	TBD	
2. Other specified date for NOI:	10/25/2021 (60 days after issuance) (Comment #1)	
3. Date NOI filed:	10/20/2022	
4. Was the NOI timely filed?		
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on ALJ ruling issued in proceeding number:	R.20-07-013 and TBD (Comment #2)	
6. Date of ALJ ruling:	12/16/2020 and TBD (Comment #2)	
7. Based on another CPUC determination (specify):	(Comment #2)	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-07-013 and TBD (Comment #2)	
10. Date of ALJ ruling:	12/16/2020 and TBD (Comment #2)	
11. Based on another CPUC determination (specify):	(Comment #2)	
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	SPD-1 SPD-2	
14. Date of issuance of Final Order or Decision:	8/25/2022	

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
15. File date of compensation request:	10/20/2022	
16. Was the request for compensation timely?		

C. Additional Comments on Part I: (use line reference # as appropriate)

#	Intervenor's Comment(s)	CPUC Discussion
1	Resolutions SPD-1 and SPD-2 are not formal proceedings in which compensation claims can be filed. In accordance with Commission guidelines (Intervenor Compensation Program guide at 27) MGRA has initiated the subject application so that the claim pertaining to SPD-1 and SPD-2 can be resolved. NOIs are filed as an attachment to the application.	
2	MGRA is requesting a ruling on its eligible customer status and significant financial hardship as part of this proceeding. The last proceeding in which findings of eligible customer status and significant financial hardship of MGRA were made was R.20-07-013 and the ruling date was 12/16/2020. Requests for determination have also been submitted by MGRA in the NOIs of proceedings A.22-05-013, A.22-05-015, A.21-06-021, and A.20-06-012 (closed), but these determinations have not yet been acted upon.	
3	Resolutions SPD-1 and SPD-2 were issued simultaneously, and since MGRA's activities overlap in these resolutions we are issuing our claim for both resolutions in the same application and claim form. MGRA's work reviewing the PG&E WMP also closely overlapped the current claim, but the Commission has yet to issue a Resolution on that matter. For MGRA's review of the 2021 WMPs, the Commission agreed at MGRA's request to consolidate separate applications dealing with resolutions WSD-019, WSD-020, and WSD-021 because their subject matter and effort involved were similar (D.22-09-023). MGRA is not making a similar request in this application, but would not object to	

#	Intervenor's Comment(s)	CPUC Discussion
	consolidation with MGRA's planned future application to seek compensation for review of the 2022 PG&E WMP, since the issues will have considerable overlap and it could potentially save effort on the part of staff and Commissioners to consolidate proceedings.	
4.	<p>In its recent Decision 22-09-023 awarding MGRA compensation for its contributions to WSD-019, WSD-020, and WSD-021, the Commission found that MGRA's comments on utility quarterly reports following on the 2020 WMPs were not compensable under Rule 17.4(d) because "they were not within the scope of the proceeding" leading to these resolutions. In the 2022 WMPs, corrective actions on Key Issues required by OEIS in its 2021 WMP review are summarized with conclusions in SPD-1 (Table A-1, p. A-2) and SPD-2 (Table A-1, p. A-2). OEIS acknowledges that MGRA review of quarterly updates contributed to one of its findings (SPD-2, A-48). To the extent that comments on quarterly updates demonstrably contribute to 1) utility wildfire mitigation plans or themselves 2) OEIS review of utility performance in the subsequent WMP review, MGRA maintains that they may be under the scope of the subsequent WMP proceeding and requests reconsideration. This issue is discussed in more detail in MGRA's application.</p>	

PART II: SUBSTANTIAL CONTRIBUTION
(to be completed by Intervenor except where indicated)

- A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): *(For each contribution, support with specific reference to the record.)*

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. Note: For definition of contribution types, see Comment 1 in Section C. For definition of issue, see Comment 2 in Section C.		

<p>2. MGRA suggested a working group to accelerate development of REFCL and other advanced technologies.</p> <p>Type: Initiator Issue: AT</p>	<p>SPD-1; p. 12 – “Energy Safety evaluated these comments and concurred with and in some instances incorporated the following stakeholder input on SDG&E’s 2022 Update, as reflected in this Decision: SDG&E and its peer utilities would benefit from forming a working group to study the use of rapid earth fault current limiter technology (MGRA).”</p> <p>SPD-2; p. 13 – “SCE and its peer utilities would benefit from forming a working group to study the use of rapid earth fault current limiter technology (MGRA).”</p> <p>SPD-1; p. 51; p. 51 – “Even if RECFL is not effectively feasible for its system, SDG&E must collaborate with other utilities to further explore the benefits of other system hardening and situational awareness technologies (such as DFA/EFD), including effectiveness against wildfire risk, particularly in combination with other initiatives such as covered conductor.”</p> <p>SPD-2; p. 119 – “All electrical corporations (not including independent transmission operators) must collaborate to evaluate the effectiveness of new technologies that support grid hardening and situational awareness such as REFCL and DFA/EDF, particularly in combination with other initiatives.”</p> <p>SPD-2; p. 120 – “Required Progress: In the 2023 WMP filing, SCE must:</p> <ul style="list-style-type: none"> - Provide SCE’s plan and timeline for moving forward with REFCL, including mileage and risk addressed. - Provide SCE’s plan and timeline for moving forward with additional pilot technologies, such as DFA and EFD. 	
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	<p>MGRA-WMP-Cmt; p. 80 – “OEIS should begin a REFCL working group with a goal of identifying design configurations that would be most appropriate for California utilities, expanding potential pilot sites and goals, and identifying and solving potential problems and pitfalls. OEIS and SCE should lead this group. The group should present bi-annually to stakeholders regarding progress.”</p> <p>MGRA-WMP-Cmt; p. 81 – “SDG&E, since it claims it has other technologies that may render REFCL unnecessary, should present these technologies in combination with covered conductor and compare them against REFCL in terms of both effectiveness and cost.”</p> <p>MGRA-QR-21Q3 – “Should REFCL deployment prove to be infeasible, there are other technologies currently under investigation by the IOUs that may complement covered conductor or other mitigations. Among technologies that should be examined are PG&E’s ECCVM and RF sensors, SDG&E’s falling conductor technology, and SCE’s MADEC. OEIS should request that IOUs assemble ‘underground equivalent’ solutions, potentially consisting of multiple hardening and technology components.”</p>	
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<p>3. MGRA suggested that major undergrounding programs should be delayed until effectiveness of alternatives has been fully evaluated.</p> <p>Type: Contributor Issue: Hdn</p>	<p>SPD-1; p. 12 – “SDG&E should delay any major roll-out of undergrounding until the effectiveness of alternatives have been evaluated (MGRA).”</p> <p>SPD-1; p. 50 – “SDG&E must provide an analysis showing it takes into account risk/cost benefit in comparison to other alternatives when selecting and prioritizing undergrounding based on location and effectiveness.”</p> <p>MGRA-WMP-Cmt; p. 76 – “Energy Safety should recommend against any major roll-out of undergrounding as a long term solution until questions regarding effectiveness of alternatives such as covered conductor and REFCL have been evaluated, and proper risk/benefit of other alternatives such as PSPS and EPSS have been incorporated as well.”</p> <p>MGRA-QR-21Q3; p. 23 – “Energy safety should ensure that alternatives to undergrounding projects are adequately investigated by utilities so that equally effective solutions can be developed if they exist. These solutions may consist of a combination of hardening and advanced technologies.”</p>	
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<p>4. MGRA recognized the importance of wildfire smoke risk and recommended that SDG&E's calculation be corrected and that other utilities take effort to incorporate this risk.</p> <p>Type: Primary Issue: RM</p>	<p>SPD-1; p. 12 – “SDG&E's initiative introducing smoke as a safety risk is noteworthy, as smoke can be a dominant safety risk for utility wildfires (MGRA).”</p> <p>SPD-2; p. 13 – “SCE should consider potential wildfire smoke exposure when estimating the risks and benefits from PSPS (MGRA).”</p> <p>SPD-1; p. 34 – “SDG&E states its risk modeling includes smoke impacts, which is important in terms of safety and larger public health impacts. SDG&E states it estimates a ‘quantification of additional significant injuries and fatalities resulting directly or indirectly from smoke, as a fraction of the population impacted.’”⁴³ 43 Data Request MGRA-SDGE-WMP22_DATAREQUEST2, Question 35.</p> <p>MGRA-WMP-Cmt; p. 50 – “The results dramatically show that the “safety risk” of direct injury or death from wildfire is usually many times smaller than the risk from wildfire smoke for every major fire.”</p>	
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<p>5. MGRA warned that the covered conductor effectiveness results presented so far are underestimates and urged OEIS to obtain output from additional IOU covered conductor testing.</p> <p>Type: Primary Issue: Hdn</p>	<p>SPD-1; p. 12 – “SDG&E should inform Energy Safety of the outcomes of its third-party covered conductor tests (MGRA).”</p> <p>SPD-2; p. 13 – “SCE should inform Energy Safety of the outcomes of its third-party covered conductor tests (MGRA).”</p> <p>MGRA-WMP-Cmt; p. 76 – “OEIS should immediately validate SCE’s current data regarding outages, wires down, and ignitions, taking into account its pace of deployment, with an eye to seeing whether effectiveness rates on the order of 60-70% are reasonable or whether effectiveness should be ranked much higher.</p> <p>MGRA-WMP-Cmt; p. 77 – “Energy Safety should request progress and final reports from SDG&E’s third-party covered conductor tests.”</p>	
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<p>6. MGRA raised the issue of the limitations of 8 hour fire modeling in the Technosylva suite used by all major IOUs for their 2022 WMP Updates.</p> <p>Type: Initiator Issue: Cqn</p>	<p>SPD-2; p. 13 – “SCE and its peer utilities should provide more information on third-party consequence modeling assumptions (MGRA).”</p> <p>SPD-1; p. 3 – “SDG&E must improve its wildfire risk and consequence and equipment failure modeling (e.g., including climate change risks, community impacts, wind gusts, and fire spread beyond eight hours).”</p> <p>SPD-1; p. 35 – “SDG&E’s current wildfire consequence simulations use a fire spread period of eight hours.⁴⁵ Many catastrophic fires burn longer than eight hours, with much of the growth occurring after the eight-hour mark.⁴⁶” 45 Data Request MGRA-SDGE-WMP22_DATAREQUEST2, Question 31. 46 MGRA Comments on 2021 WMPs of PG&E, SCE, and SDG&E; p. 48-55.</p> <p>SPD-2; p. 39 – “SCE has made progress in evaluating wildfire spread beyond an eight-hour timeframe, which should provide a more accurate representation of consequence than evaluating wildfire spread with an eight-hour cap.”</p>	
<p>7. MGRA served extensive data requests on the major IOUs, the results of which were used by OEIS in its review.</p> <p>Type: Contributor Issue: Gen</p>	<p>SPD-1; p. 12 – “In addition to the above, Energy Safety’s review benefited from the discovery materials generated by data requests submitted to SDG&E by the stakeholders named above, in particular Cal Advocates and MGRA.”</p>	

<p>8. MGRA’s analysis found that IOU ignition models lacked appropriate correlation with the extreme weather events used for fire spread modeling. This leads to underestimation of relative risk from high wind gust events and overestimation of risks from non-correlated ignitions such as animals, vehicles, and balloons.</p> <p>Type: Primary Risk: IgW</p>	<p>SPD-1; p. 19 – “In its 2023 WMP, SDG&E must further refine its prioritized list of wildfire risks and drivers (2022 Update, Table 4-6, p. 48) by weighting each risk driver by likelihood of causing a catastrophic wildfire. For example, the utility must factor in whether ignition caused by this driver tends to happen in high wildfire risk areas as identified by SDG&E’s risk models, including the HFTD.”</p> <p>SPD-1; p. 37 – “Similar to SDG&E’s 2021 WMP, SDG&E still ranks vehicle and balloon contacts as top risks based on the high number of outages, even though vegetation contact (ranking second) and other equipment failure (tied for third⁵²) have higher ignition rates.⁵³ These rankings seemingly do not impact SDG&E’s actual analysis for risks in the field, and SDG&E accounts for third-party ignition sources within its modeling.⁵⁴ However, these rankings are misleading regarding risks pertinent to catastrophic fires.”</p> <p>SPD-1; pp. 36-37 – “SDG&E’s vegetation PoI/PoF model currently does not include wind gusts as a variable. SDG&E states that it needs to conduct more analysis on the relationship between vegetation failure and wind gusts before including wind gusts as a variable but provides no further details.⁵¹ SDG&E must provide details on the nature and timeline of the additional analysis needed.” Data Request MGRA-SDGE-WMP22_DATAREQUEST2, Question 25.</p> <p>SPD-2; p. 22 – “SCE factors in average outages and ignition rates to derive an adjusted risk score but does not factor in the risk of an ignition causing a wildfire.</p>	
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	<p>Consequently, the provided list is an ignition risk ranking, not a wildfire risk ranking. In its 2023 WMP, SCE must further refine its prioritized list of wildfire risks and drivers (2022 Update, Table 4-6, p. 48) by weighting each risk driver by likelihood of causing a catastrophic wildfire. For example, the utility must factor in whether an ignition caused by this driver tends to happen in high wildfire risk areas as identified by SCE’s risk models, including the HFTD.</p> <p>MGRA-WMP-Cmt; pp. 39-40 – “For the conductor segment risk models used by the utilities to plan their hardening priorities, wind and wind-driven ignition vulnerabilities appears to be a minor contributor to risk as hourly wind data cannot be incorporated into the existing machine learning models. For their operational risk models used for de-energization, however, utilities have incorporated incremental wind data and their models show a very strong wind dependency, as expected. For enterprise models, only PG&E incorporates wind, indirectly, through the use of a Red Flag Warning criteria, yet this is enough to make a dramatic change to their predicted risk profile, with only 4% of ignition risk assigned to external contact from non-vegetation objects (cars, animals, balloons). In contrast, SCE assigns 39% of its ignition risk to such drivers and SDG&E assigns 47% of its risk to nonvegetation object risk drivers (cars, animals, balloon, other)”</p> <p>MGRA-SCE-DD-Cmt; p. 8 – “SDG&E and SCE artificially amplify risk from drivers such as animals, vehicles, and balloons that are rarely if ever responsible for catastrophic fires.”</p>	
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	<p>MGRA-QR-21Q3 – “The decision to capture weather variables as aggregates underlies the problem with IOU approaches to incorporating wind as an ignition source. Extreme weather events are rare, and averaging them over longer periods of moderate weather can wash out the signal so that it is invisible.”</p>	
<p>9. MGRA has recommended the inclusion of PSPS damage events into consequence models to avoid suppression of risk indicators in PSPS-prone areas.</p> <p>Type: Primary Issue: PS</p>	<p>SPD-2; p. 126 – “In its 2023 WMP Update, SCE must report on progress to include observed PSPS event damage points as data input into its PSPS consequence models.”</p> <p>MGRA-WMP-Cmt; p. 57 – “All utilities should use outages with conditional ignition probabilities, and also merge PSPS damage events into their risk event samples to avoid suppressing risk indicators from areas often subject to PSPS.</p> <p>Urgency: Class C – Next WMP. However, Energy Safety should warn utilities that PSPS bias should be removed from risk rankings prior to the initiation of major hardening programs.”</p> <p>MGRA-QR-21Q3; p. 14 – “p. 14 - PSPS damage data should not be limited to operational purposes, but also be used by all IOUs in risk modeling for the purpose of determining areas to harden and where PSPS-specific mitigation might prove most beneficial.”</p>	

<p>10. Energy Safety marked SCE’s machine learning ignition model 2021 issues as “sufficiently addressed”. MGRA’s comments pointed out that this issue is open, and Energy Safety changed the draft language accordingly.</p> <p>Type: Primary Issue: IgW</p>	<p>SPD-2; p. A-48 – “MGRA comments that, while SCE provided further technical explanation of its machine-learning model in its quarterly updates, it did not explain how correlations with consequence were handled. Energy Safety marked this issue as “Utility sufficiently addressed the required remedy.” This issue should instead be labeled as “Addressed in Areas for Continued Improvement” in the appropriate section, since it is still an area of active development. (SCE-22-11)</p> <ul style="list-style-type: none"> o Energy Safety has modified the language related to SCE-21-11 to indicate it is an area Energy Safety will continue to monitor. <p>MGRA-SCE-DD-Cmt; p. 4 – “The matter of correlations between outages, ignitions, and consequences is a matter of active discussion within OEIS’s Risk Modeling Working Group, and it will likely remain so into the next WMP cycle.”</p> <p>MGRA-QR-21Q3; p. 10 – “PG&E should be weighting its risk calculations by a normalization factor representing the fraction of time that the Technosylva “400 worst days” weather conditions are applicable for that geographic point. Otherwise, it is greatly overestimating the risk from random ignitions.”</p>	
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<p>11. MGRA was a contributor to joint stakeholder comments on the Draft 2022 Wildfire Mitigation Plan Update Guidelines. These led OEIS to change the comment period and submission deadlines.</p> <p>Type: Contributor Issue: Gen</p>	<p>OEIS-Gdln-RL; p. 2 – “Energy Safety made the following changes to Attachment 5 as a result of stakeholder comments:</p> <ul style="list-style-type: none">• Extended the public comment period for the WMPs.• Clarified the Quarterly Data Report submission schedule.• Changed the utility WMP submission dates, workshop dates, stakeholder comment deadlines, and other associated dates and deadlines.” <p>JS-Gdln-Cmt; p. 4 – “Currently, the draft schedule allows nine weeks for Energy Safety staff to analyze public comments before it publishes its draft action statement for each utility, compared to five and a half weeks in 2020.”</p> <p>p. 7 – “Energy Safety should adopt a schedule that permits stakeholders to file comments on cross-cutting issues”</p> <p>p. 13 – “3. Extend all comment deadlines by three weeks.”</p>	
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<p>12. MGRA is a participant and contributor to the OEIS Risk Modeling working group. MGRA has provided input on subjects including ignition likelihood, consequence modeling, and PSPS consequences. This group was established to address the lack of consistency in approach to wildfire risk modeling across utilities, and increased collaboration across utilities in WMP development.</p> <p>Type: Contributor Issue: RM, Csq, IgW</p> <p><i>Compensation request held for future WMP filing.</i></p>	<p>SCE-2022-WMP; p. 636 – “Energy Safety established an initial schedule of bi-weekly working group meetings, starting October 20, 2021 and running through January 19, 2022, on various risk-modeling related topics such as modeling components, algorithms, data and impacts of other issues on modeling such as climate change and ingress/egress.”</p> <p>p. 637 – “10/27 Meeting Logistics; modeling baselines, alignment, and past collaboration</p> <p>11/17 Fire consequence (drivers, meteorology/climatology, environment, and fuels data)</p> <p>12/8 Likelihood of asset risk events and ignitions (data, inputs, and risk drivers relating to assets, faults/outages/ignitions)”</p> <p>SPD-1; p. 34 – “The Wildfire Risk Modeling Working Group is ongoing, and guidance is still pending. Energy Safety anticipates that guidance for modeling will impact SDG&E’s 2023 WMP and/or 2024 Update. At this time, SDG&E has not applied any changes to its risk modeling methodologies, but plans to do so in future WMP filings.”</p>	
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<p>13. MGRA contributed at the RSE workshop held by OEIS to discuss how risk/spend efficiency could be treated more uniformly across utilities. In its 2021 WMP comments, MGRA contributed to OEIS's finding that "RSE Values Vary Across Utilities", and MGRA continued to advocate for a more uniform approach during the workshop. OEIS continued to find a deficiency in this area in 2022.</p>	<p>SPD-2; p. 124 – "SCE does not confirm its RSE estimates with independent experts or other utilities in California.</p> <p>o Required Progress: In its 2023 WMP, SCE must show that its RSE estimates are confirmed by a third party or detail an action plan and associated timeline for third party confirmation of all RSE estimates."</p> <p>SCE-2022-WMP; p. 634 – "On December 9, 2021, Energy Safety facilitated a public workshop on utility risk spend efficiency (RSE) estimates. Each of the utilities presented the current status of their RSE calculation methodologies, and stakeholders had an opportunity to ask questions of utility representatives as well as RSE experts. RSE experts included Tom Long from The Utility Reform Network (TURN), Fred Hanes, senior utilities engineer from the California Public Utilities Commission (CPUC), and Joseph Mitchell from Mussey Grade Road Alliance (MGRA)."</p> <p>p. 635 – "At the conclusion of the workshop, Energy Safety requested that the utilities submit reports providing a detailed description on their RSE calculation methodology."</p>	
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<p>14. MGRA confirmed that SDG&E's remediation of 2021 Vegetation Management issues raised by MGRA were successfully incorporated in its 2022 WMP analysis.</p> <p>Type: Primary Issue: VM</p>	<p>SDGE-2022-WMP; p. 17 – “Since submitting the 2021 WMP update, SDG&E has continued to refine its study of enhanced tree clearances and tree-related outages with updated data to better understand its assessment of targeted species. SDG&E has collaborated with the San Diego Supercomputing Team in this initiative. Chart 6.2 was created using updated data points to compare with the excerpted table previously prepared by Mussey Grade Road Alliance (MGRA) (see Chart 6.3 below).”</p> <p>MGRA-WMP-Cmt; p. 81 – “SDG&E worked with the San Diego Supercomputing Team to further refine and improve upon MGRA's 2020 analysis using scrubbed data and machine learning,¹⁷³ and their results qualitatively support the relative species risk rankings of the MGRA analysis. SDG&E also performed a statistical analysis of trim distance versus outage rate, which MGRA had been urging since 2019 and has finally produced a definitive study to support its vegetation management program.¹⁷⁵”</p>	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties: TURN, GPI, Will Abrams, RCRC		

² The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?²	Yes	
d. Intervenor's claim of non-duplication: <p>MGRA, due to its emphasis on safety and its strong technical background, was able to take a number of unique positions in its interventions. MGRA was involved in the 2019, 2020, and 2021 WMPs as well as the original development of utility Fire Protection Plans and brings with it directional vision for utility fire safety.</p> <p>While other intervenors' positions are similar to MGRA's in a few cases, there are notable differences. TURN's primary goal has been ratepayer protection. GPI is concerned with renewable energy. These lead to a difference in emphasis between MGRA's positions and those of the others.</p> <p>Additionally, MGRA contributions tend to be based on collection and analysis of utility data, which makes its contributions distinctive among intervenors. Because MGRA's contributions were primarily technical, we did not anticipate that our technical contributions would substantially overlap with those of other intervenors, and to a great extent overlap was minimal.</p> <p>MGRA also coordinated with other stakeholders, for instance initiating the request for deadline change, later granted by OEIS.</p>		

C. Additional Comments on Part II: (use line reference # or letter as appropriate)

#	Intervenor's Comment		CPUC Discussion
1	Contribution Types	There are various types and levels of contribution that the Alliance interventions provided. These are defined and explained below.	
	Primary	A Primary contribution is one in which the Alliance made a unique and definitive difference in supplying information not supplied by any other party. The Alliance can show that "but for" its intervention, the Decision would have likely reached a different conclusion.	

#	Intervenor's Comment		CPUC Discussion									
	<table><tr><td>Initiator</td><td>In instances where the Alliance was an "Initiator", it was the first to bring a particular issue or analysis to the Commission's attention. Other parties subsequently made additions or improvements that were accepted by the Commission.</td></tr><tr><td>Contributor</td><td>While not initiating an analysis or study, the Alliance made a significant contribution to it. Also, in decisions or conclusions which take into account many different factors, the Alliance's results contribute one or more of these factors.</td></tr><tr><td>Improvement</td><td>The Alliance commented on an existing process or measure and its suggestion was adopted in the final decision.</td></tr><tr><td>Complimentary</td><td>The Alliance chose a different method or analysis than that used in the Final Decision, but which is consistent with it and supports the same results.</td></tr><tr><td>Alternative</td><td>The Alliance reached a conclusion or presented an analysis at variance with the Decision but which raised important points.</td></tr></table>	Initiator	In instances where the Alliance was an "Initiator", it was the first to bring a particular issue or analysis to the Commission's attention. Other parties subsequently made additions or improvements that were accepted by the Commission.	Contributor	While not initiating an analysis or study, the Alliance made a significant contribution to it. Also, in decisions or conclusions which take into account many different factors, the Alliance's results contribute one or more of these factors.	Improvement	The Alliance commented on an existing process or measure and its suggestion was adopted in the final decision.	Complimentary	The Alliance chose a different method or analysis than that used in the Final Decision, but which is consistent with it and supports the same results.	Alternative	The Alliance reached a conclusion or presented an analysis at variance with the Decision but which raised important points.	
Initiator	In instances where the Alliance was an "Initiator", it was the first to bring a particular issue or analysis to the Commission's attention. Other parties subsequently made additions or improvements that were accepted by the Commission.											
Contributor	While not initiating an analysis or study, the Alliance made a significant contribution to it. Also, in decisions or conclusions which take into account many different factors, the Alliance's results contribute one or more of these factors.											
Improvement	The Alliance commented on an existing process or measure and its suggestion was adopted in the final decision.											
Complimentary	The Alliance chose a different method or analysis than that used in the Final Decision, but which is consistent with it and supports the same results.											
Alternative	The Alliance reached a conclusion or presented an analysis at variance with the Decision but which raised important points.											
2	<p>Abbreviations for issues that MGRA was involved in:</p> <p>Gen: General Procedural issues, preambles, establishing record, scope, process, general document review</p> <p>RM: Risk Modeling Issues relating to fire spread and consequence modeling.</p> <p>VM: Vegetation Management Issues relating to vegetation management.</p> <p>Cqs: Consequence Modeling Issues related to fire spread modeling and impacts.</p> <p>IgW: Ignition and Wind Issues related to wind speeds, calculated and measured, and to ignition probability.</p> <p>Hdn: Hardening Issues related to covered conductor, undergrounding, and other hardening mitigations.</p> <p>PS: Power Shutoff Issues related to PSPS and mitigations to reduce PSPS, as well as EPSS and “Advanced Trip” settings</p> <p>AT: Advanced Technologies Issues related to advanced mitigation technologies, situational awareness, and utility pilot programs.</p> <p>Aff: Affordability/Public Safety Issues related to the direct impact of utility costs on public health and safety.</p>											

#	Intervenor's Comment	CPUC Discussion
3	Abbreviations for documents SPD-1 Final Resolution Ratifying OEIS SDG&E WMP Review SPD-2 Final Resolution Ratifying OEIS SCE WMP Review MGRA-PGE-RN-Rsp MGRA Response to PG&E revision notices (Att 8) MGRA-SCE-DD-Cmt MGRA Comments on OEIS SCE Draft Decision (Att 9) MGRA-WMP-Rep MGRA Reply to Stakeholder comments on WMPs (Att. 7) MGRA-WMP-Cmt MGRA 2022 WMP Comments (Att. 6) OEIS-Gdln-RL OEIS final (redline) for 2022 WMP Guidelines (Att. 11) JS-Gdln-Cmt Joint Stakeholder comments on draft 2022 WMP Guidelines (Att. 10) MGRA-QR-21Q3 Comments on 2021 Q3 quarterly reports (Att. 12) MGRA-QR-21Q2 Comments on 2021 Q2 quarterly reports (Att. 13) SCE-2022-WMP SCE 2022 WMP https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051 SDGE-2022-WMP SDGE 2022 WMP https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033	

PART III: REASONABLENESS OF REQUESTED COMPENSATION
(to be completed by Intervenor except where indicated)

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: Over recent years, utility-caused wildfires have resulted in the deaths of over 130 people and damages over \$20 billion. The primary goal of the Mussey Grade Road Alliance in its interventions since 2007 has been to identify utility wildfire risks and to identify strategies to prevent them. In the context of wildfire risk, any strategy that reduces risk and does so at a reasonable cost provides a tremendous benefit to ratepayers. MGRA's expert, Joseph W. Mitchell, has been providing technical analysis of utility data and has published academic works on this subject, and has made numerous contributions to fire safety that have been recognized by the Commission. MGRA contributions were limited to areas in which we could provide unique, quantitative contributions.	

	CPUC Discussion
<p>Dr. Mitchell's requested compensation rate reflects his 31 years of work as a Level V Physicist and his 15 years of work on the Commission. His analysis has contributed significantly to the risk analysis that is central to review of the Wildfire Mitigation Plans.</p> <p>While it is hard to accurately quantify the extent to which MGRA's contribution will decrease future risk and costs, even an incremental contribution, when multiplied by the avoided losses, vastly exceeds the compensation being requested by the Alliance.</p>	
<p>b. Reasonableness of hours claimed:</p> <p>MGRA was careful to limit its participation to areas in which its expert could make a unique and substantive contribution, and to procedural areas of vital interest to the success of the proceeding.</p> <p>Dr. Mitchell has been intervening on fire safety issues before the Commission since 2007. Dr. Mitchell was the Alliance expert involved in the original Commission proceeding establishing Fire Protection Plans (which he proposed), R.08-10-005. He was involved in the review of utility 2019, 2020, and 2021 Wildfire Mitigation Plans. He was therefore well-prepared for this proceeding and was able to efficiently identify and concentrate on key issues that needed attention.</p> <p>Dr. Mitchell has also contributed 21.7 hours of work on the OEIS risk modeling working group. This work is not being claimed under the current application, but may be claimed in a future application if it results in contributions to future Wildfire Mitigation Plans.</p>	
<p>c. Allocation of hours by issue:</p> <p>SCE: Gen: 32.7 RM 5.6 VM 1.1 Cqs 5.4 IgW 18.4 Hdn 8.1 PS 3.6 AT 2.2 Aff 1.6</p> <p>SDG&E: Gen: 31.7 RM 5.5 VM 1.5 Cqs 5.2 IgW 7.7 Hdn 6.7 PS 4.1 AT 2.9 Aff 1.3</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Dr. Joseph Mitchell (Expert) SDG&E	2021	15.6	\$380	D.22-09-023	\$5,931			
Dr. Joseph Mitchell (Expert) SCE	2021	17.1	\$380	D.22-09-023	\$6,498			
Dr. Joseph Mitchell (Expert) SDG&E	2022	44	\$392	D.22-09-023, ALJ-393 Hourly Rate Chart 6/10/22	\$17,252			
Dr. Joseph Mitchell (Expert) SCE	2022	54.6	\$392	D.22-09-023, ALJ-393 Hourly Rate Chart 6/10/22	\$21,400			
Subtotal: \$51,081						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Dr. Joseph Mitchell (Expert) SDG&E	2022	11.7	\$196	D.22-09-023, ALJ-393 Hourly Rate Chart 6/10/22	\$2,283			
Dr. Joseph Mitchell (Expert) SCE	2022	11.7	\$196	D.22-09-023, ALJ-393 Hourly Rate Chart 6/10/22	\$2,283			

CLAIMED				CPUC AWARD
<i>Subtotal: \$4,566</i>				<i>Subtotal: \$</i>
COSTS				
#	Item	Detail	Amount	Amount
1.				
2.				
<i>Subtotal: \$</i>				<i>Subtotal: \$</i>
<i>TOTAL REQUEST: \$55,647</i>				<i>TOTAL AWARD: \$</i>
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>				
ATTORNEY INFORMATION				
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation	

C. Attachments Documenting Specific Claim and Comments on Part III:
(Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
Main	Application for Intervenor Compensation
1	Certificate of Service
2	Present Claim
3	Notice of Intent to Claim Intervenor Compensation
4	Dr. Joseph W. Mitchell SDG&E timesheet
5	Dr. Joseph W. Mitchell SCE timesheet

³ This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Attachment or Comment #	Description/Comment
6	MGRA 2022 WMP Comments
7	MGRA 2022 WMP Reply
8	MGRA 2022 WMP PG&E Revision Notice Response
9	MGRA 2022 WMP Comments on SCE Draft Decision
10	Joint Stakeholder Comments on OEIS Draft 2022 Guidelines
11	2022 WMP Guidelines, redline version
12	MGRA 2021 Q2 Report Comments
13	MGRA 2021 Q3 Report Comments
Link #1	SCE 2022 WMP https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051
Link #2	SDGE 2022 WMP https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52033
Comment #1	The hourly rate chart dated 6/10/2022 specified a 3.31% annual escalation adjustment.
Comment #2	Comments re Mitchell timesheet, Attachment 3: Work on the WMP reviews was done as a common filing. Work is divided between utilities by the weights shown in Columns H:J on the timesheet. Work that was of general use to all utilities was divided equally among SDG&E, PG&E, and SCE.

D. CPUC Comments, Disallowances, and Adjustments (*CPUC completes*)

Item	Reason

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff
or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Discussion

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B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

(Green items to be completed by Intervenor)

FINDINGS OF FACT

1. [INTERVENOR'S FULL LEGAL NAME] [has/has not] made a substantial contribution to D. _____.
2. The requested hourly rates for [INTERVENOR'S FULL LEGAL NAME]'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$_____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. [INTERVENOR'S FULL LEGAL NAME] is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay [INTERVENOR'S FULL LEGAL NAME] the total award. [for multiple utilities: "Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay [INTERVENOR'S FULL LEGAL NAME] their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used."]] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial

commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of [INTERVENOR'S FULL LEGAL NAME]'s request, and continuing until full payment is made.

3. The comment period for today's decision [is/is not] waived.

This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):			
Proceeding(s):			
Author:			
Payer(s):			

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
[INTERVENOR'S NAME]				N/A	

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted

(END OF APPENDIX)